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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:

Further Comment on Cost Models in
Universal Service

)
)
)
)

CC Docket No. 96-45

COMMENTS
OF THE

UNITED STATES TELEPHONE ASSOCIATION

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August 9, 1996

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SUMMARY

A proxy could be used to identify high-cost areas, not to determine the costs of providing the core universal service definition. Proxies cannot accurately determine the costs which will be incurred to provide such services or the prices which should be charged to recover those costs.

A determination of the costs of providing universal service must include all the costs of service, including embedded and joint and common costs. Embedded costs are appropriate because the actual costs of universal service are the result of past requirements imposed on incumbent exchange carriers to serve all customers and operate as carriers of last resort.

USTA strongly recommends that no proxy be mandated for rural telephone companies due to difficulties regarding the use of incremental costs, difficulties in evaluating the models and the fact that smaller study areas do not experience the averaging which occurs in larger study areas.

USTA opposes the use of the initial BCM and the Hatfield models for any purpose. The initial BCM has been modified and resubmitted. The Hatfield model does not model the costs of any realistic local service provider. It uses questionable and/or non-representative assumptions.

The incumbent exchange carrier industry is working to harmonize the BCM2 and the CPM. These models are far superior to the original BCM and Hatfield models. These models appear to consider all the economic costs associated with the provisioning of universal service.

Before the
FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its comments in the above-referenced proceeding. USTA is the principal trade association of the exchange carrier industry. Its members provide over 95 percent of the exchange carrier-provided access lines in the U.S.

On July 10, 1996 the Common Carrier Bureau released a public notice requesting comment on several cost models which were submitted by parties to identify high-cost areas and to produce benchmark cost ranges for supplying basic residential telephone service.

USTA has consistently maintained that a proxy could be used to identify high-cost areas, not to determine the costs of providing the core universal service definition. Proxies cannot accurately determine the costs which will be incurred to provide such services or the prices which should be charged to recover those costs. Proxies rely on uniform assumptions that may be appropriate under certain circumstances and may not be appropriate under other circumstances.

A determination of the costs of providing universal service must include all the costs of service, including embedded and joint and common costs. Embedded costs are appropriate because the actual costs of universal service are the result of past commitments. Incumbent exchange carriers have provided high quality services at affordable rates and have incurred substantial costs to provide ubiquitous connectivity among all points on the public switched network as a result of requirements to serve all customers and to operate as carriers of last resort.¹ Regulators traditionally allowed incumbent exchange carriers an opportunity to recover these costs.

Incremental costs are forward-looking costs which, by definition, disregard costs imposed by historical obligations. Therefore, basing universal service support simply on the difference between incremental costs and rates will prevent incumbent exchange carriers from recovering the embedded costs of past obligations.

Pricing all services at incremental costs would also prevent incumbent exchange carriers from recovering substantial shared and common fixed costs. Without a contribution to such costs, incumbent exchange carriers cannot remain viable.

It has been difficult for small, rural telephone companies individually to examine any of the proxy models. The expense of obtaining the hardware and software required to run the proxy models may be prohibitive and the short time frame provided for analysis does not accommodate the learning curve necessary for these companies to understand the models. In addition, some of the inputs come from sources that are not accessible to or that cannot be provided by small

¹This includes slower than economic depreciation of assets placed to provide universal service.

companies.

Based on the difficulties described above regarding the use of incremental costs and the difficulties in evaluating the models, proxies should not be mandated for rural telephone companies as defined in the Act.²

USTA opposes the use of the initial Benchmark Cost Model (BCM) and the Hatfield model. These models produce incremental costs, but not actual or embedded costs. They cannot be used to determine the absolute size of the universal service fund.

The initial BCM did not include drop wire or terminal expense. As will be noted below, this model has been modified and a new version has been submitted on the record. The Hatfield model does not model the costs of any realistic local service provider and the particular inputs and processes understate the costs of providing universal service.³

For example, Hatfield uses questionable and/or non-representative assumptions about engineering practices (e.g., including loop lengths, switch types for rural and urban areas, and feeder lengths). Hatfield uses unrealistic fill factors and switching costs. The Hatfield model incorrectly determines the cost factors it applies to investment for estimating the costs of providing universal service. Hatfield ignores the fact that investment is irreversible, sunk and

²Small telephone company study areas are generally smaller and thus do not experience the averaging which occurs in larger study areas.

³See, BellSouth Ex Parte filing, June 20, 1996 in CC Docket No. 96-45. The Hatfield model results are, at best, "puzzling" according to an analysis performed by Dr. Anna-Maria Kovacs in "Focus on the Federal Communications Commission," Janney Montgomery Scott, Industry Update, July 8, 1996. See, also, Strategic Policy Research, "Comments on Hatfield Study," May 30, 1996.

subject to technological change and interest rate variability as well as demand and price uncertainties resulting from the requirements of the Act.

Finally, the Hatfield model has been difficult to analyze because the underlying algorithms have not been publicly available and the documentation is incomplete. In addition, the inputs are from varied sources that are inconsistent and inappropriate, making it impossible to verify.

The incumbent exchange carrier industry is working together to analyze the Cost Proxy Model (CPM) sponsored by Pacific Bell and the Benchmark Cost Model 2 (BCM2) submitted by U S WEST and Sprint. The CPM utilizes an open architecture that supports various inputs for loop plant and contains algorithms that are documented and can be modified for any incumbent exchange carrier environment including, but not limited to, population density, climate, costs, terrain, technology and engineering practices. BCM2 was developed to better identify rural, as well as urban, costs and to provide more accuracy and flexibility in the processing of the model.

Compared to the Hatfield model, these models are consistent with accepted economic principles and utilize publicly available cost data. These models appear to consider all the economic costs associated with the provisioning of universal service. They better reflect the factors which affect the cost of providing universal service than either the Hatfield model or the initial BCM. The incumbent exchange carrier industry should be permitted an opportunity to harmonize these models.

Based on the foregoing, if a proxy model is to be considered, the model should be used to identify high-cost areas, not to determine the cost or to set the price for universal service. No proxy model should be mandated for rural telephone companies. The Hatfield model and the initial BCM are inappropriate and should not be adopted for any purpose.

Respectfully submitted,

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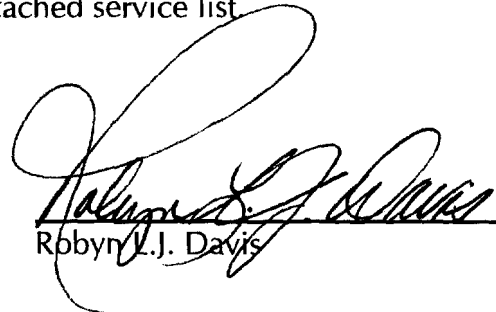
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I, Robyn L.J. Davis, do certify that on August 9, 1996 comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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